REMARKS

The specification has been amended to correct minor clerical errors and to employ more idiomatic English. No new matter has been entered.

The claims have been amended to better define the claimed invention and better distinguish the claimed invention from the prior art. More particularly, independent claims 1 and 8 and the several claims dependent thereon have been amended to stress that the display filter absorbs incident visible light having wavelengths other than the wavelengths of red, green and blue light, while permitting red, green and blue light emitted from the display to pass therethrough. None of the art teaches this.

Considering first the rejection of claims 1, 3, 5, 8, 10 and as being anticipated by Teng et al. (U.S. Patent Application Pub. No. US 2002/0005509 A1), Teng et al. teaches a spectrally tuned filter. More particularly, Teng et al. teaches a filter comprising "at least one specific red dye or a mixture of specific red dyes alone or in combination with other specific dye mixtures and which is adapted to substantially selectively transmit predetermined primary color wavelengths of an electromagnetic spectrum as well as to selectively absorb wavelengths other than said predetermined primary color wavelengths" (paragraph 0016). However, what Teng et al. fails to teach is a filter or light absorber for absorbing incident visible light waves having a wavelength other than the wavelengths of red, green and blue lights, while permitting red, green and blue light emitted from the display to pass therethrough. That is to say, Teng et al. does not recognize the criticality of absorbing incident light rays having a wavelength other than wavelengths of red, green and blue lights while permitting red, green and blue light emitted from the display to pass therethrough or the advantages thereof in terms of improved

HAYES SOLOWAY P.C.
130 W. CUSHING ST.
TUCSON, AZ 85701
TEL. 520.882.7623
FAX. 520.882.7643

175 CANAL STREET
MANCHESTER, NH 03101
TEL. 603.668.1400
FAX. 603.668.8567

contrast, even where a display unit is in the direct sun or a brightly lit room. Accordingly, none of claims 1, 3, 5, 8, 10 and 12 can be said to be anticipated by Teng et al.

Turning to the rejection of claim 8 as anticipated by Wani et al. (U.S. Patent No. 6,552,486), Wani et al. teaches a display panel having a filter for absorbing ambient light. However, there is no teaching within the four corners of Wani et al. of absorbing only incident external light in an area where the display unit is used while permitting red, green and blue light emitted from the display unit to pass therethrough, as required by claim 8 as amended. Accordingly, claim 8 cannot be said to be anticipated by Wani et al.

Turning to the rejection of claims 1, 2, 7, 9 and 14 as anticipated by Wani et al. in view of JP '048, as noted *supra*, Wani et al. merely teaches a display unit having a filter for absorbing external light in an area where the display unit is used. However, there is no teaching or suggestion within the four corners of Wani et al. of a filter having a function of absorbing incident visible light rays having a wavelength other than the wavelengths of red, green and blue while permitting red, green and blue light emitted from the display unit to pass therethrough, as required by Applicant's claims. The secondary reference JP '048 does not supply the missing teachings. JP '048 has been cited as teaching a display filter comprising a dye or pigment (light absorber) having absorption between the green and the blue light-emission spectra and another dye or pigment having absorption between the green and red light-emission spectra. Even assuming *arguendo* JP '048 is as the Examiner characterizes it, JP '048 still does not supply the missing teachings to Wani et al. to achieve or render obvious any of Applicant's claims 1, 2, 7, 9 and 14, since there is no teaching or suggestion within the four corners of either reference of a display filter having a function of absorbing incident

HAYES SOLOWAY P.C.
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175 CANAL STREET
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TEL. 603.668.1400
FAX. 603.668.8567

visible light waves having a wavelength other than the wavelengths of red, green and blue lights, while permitting red, green and blue light emitted from the display unit to pass therethrough. Indeed, JP '048 teaches absorbing totally different wavelengths. Thus, no combination of Wani et al. and JP '048 could achieve or render obvious Applicant's claimed invention.

Finally, turning to the rejection of claims 1 and 14 as obvious from Zieba et al. (U.S. Patent No. 5,811,923) in view of Teng et al., Zieba et al. teaches a plasma display panel with infrared absorbing coating. Applicant's claims require a filter having a function of absorbing incident visible light rays having a wavelength other than wavelengths of red, green and blue lights, while permitting red, green and blue light emitted from the display unit to pass therethrough. Thus, Zieba et al. is fundamentally different from Applicant's claimed invention.

The second reference, Teng et al. does not supply the missing teachings to Zieba et al. to achieve or render obvious any of Applicant's claims. As noted *supra*, Teng et al. also fails to teach the criticality of a filter having a function of absorbing incident visible light rays having a wavelength other than the wavelengths of red, green and blue lights while permitting red, green and blue light emitted from the display unit to pass therethrough. Thus, no combination of Zieba et al. and Teng et al. could achieve any of Applicant's claims. Moreover, Teng et al. specifically teaches a display unit with an infrared absorbing coating. To substitute another coating not absorbing in the infrared region would be contraindicated by Zieba et al. Thus, there would be no motivation for one skilled in the art to make the substitution proposed by the Examiner in any event, and Applicant's claims cannot be said to be obvious from Zieba et al. taken with Teng et al.

HAYES SOLOWAY P.C.
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FAX. 520.882.7643

175 CANAL STREET
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TEL. 603.668.1400
FAX. 603.668.8567

Having dealt with all the objections raised by the Examiner, the Application is believed to be in order for allowance. Early and favorable action are respectfully requested.

In the event there are any fee deficiencies or additional fees are payable, please charge them (or credit any overpayment) to our Deposit Account Number 08-1391.

Respectfully submitted,

Norman P. Soloway
Attorney for Applicant
Reg. No. 24,315

CERTIFICATE OF MAILING

I certify that this correspondence is being deposited with the United States Postal Service as First Class mail in an envelope addressed to MAIL STOP AMENDMENT Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450 on June 9, 2004 at Tucson, Arizona.

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HAYES SOLOWAY P.C.
130 W. CUSHING ST.
TUCSON, AZ 85701
TEL. 520.882.7623
FAX. 520.882.7643

175 CANAL STREET
MANCHESTER, NH 03101
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